

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)**

DAVID GRAHAM GOODMAN,

Plaintiff,

v.

KENNETH W. STOLLE, ET AL.,

Defendants.

**Civil Action No. 1:13-cv-540**

**MOTION FOR SANCTIONS PURSUANT TO RULE 37(e)**

Pursuant to Federal Rule of Civil Procedure 37(e), Plaintiff David Graham Goodman (“Plaintiff”), by and through undersigned counsel, respectfully moves the Court for sanctions against Defendants Diggs, Hayes, Moissett, and Repass for failure to preserve electronically stored information. This motion is made on the grounds set forth in the accompanying Memorandum in Support of Motion for Sanctions Pursuant to Rule 37(e). Counsel for Plaintiff hereby certifies that the parties have met and conferred by telephone in a good-faith effort to narrow the areas of disagreement.

Two proposed orders, reflecting the alternative forms of relief Plaintiff seeks, are attached to this motion.

Dated: November 5, 2021

Respectfully submitted,

/s/ Lauren C. Andrews  
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**CERTIFICATE OF SERVICE**

I hereby certify that on November 5, 2021, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the following:

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